8. SITE CONTROL AND SECURITY

Work zones at project sites will be established based on the known, expected, and potential levels of radiological and chemical contamination present at the site. Entry into and exit out of project work zones will be controlled through the appropriate use of barriers, signs, and other measures that are described in detail in this section (refer to PRD-5117 [PRD-2022]). Personnel not directly involved with project activities shall be excluded from entering work zones. Nonfield team members, such as inspectors, may be admitted to the OU 3-13 project task site provided they are on official business, escorted by the FTL/STR or HSO, and have met all the training requirements for the area they wish to access in accordance with Section 7 of this HASP.

Note: The HSO, IH, or RadCon personnel will assist the FTL/STR in establishing the EZ, contamination reduction zone (CRZ), and SZ for the project based on IH exposure assessment, site characterization, and RadCon radiological evaluations. The determination as to any visitor's "need" for access beyond the SZ at the project site will be made by the FTL/STR and HSO in consultation with the IH and/or RCT personnel.

Additional site access control may be utilized including security personnel posted at the site entrance(s) to control access. Communication between the support zone personnel (BBWI) and security may be utilized to restrict or permit access during critical and noncritical operations. Signs may also be posted at the site entrance to inform individuals wanting access that they must obtain permission from BBWI support zone personnel. Security may restrict access to personnel during critical operations such as venting, flaring, cylinder disturbance operations, and other potentially hazardous operations at the direction of BBWI support zone personnel.

The OU 3-13, Group 6 project site work zones will be maintained during off-hours and weekends. These zones and areas will remain intact until all project tasks have been completed and equipment and supplies have been decontaminated and removed from the project. The FTL/STR, HSO, and RCT will ensure that project zones are posted and intact when leaving the site and will be responsible for breaking down the zones when project activities have been completed.

Figures 8-1 and 8-2 illustrate an example of work zones that may be established at the OU 3-13 Group 6 project task site, based on HSO/RCT/IH recommendations. Common barriers may be used to delineate both radiological and nonradiological work zone postings, depending on the nature and extent of contamination. If common barriers are used, they will be delineated and posted according to both sets of requirements (29 CFR 1910.120 and 10 CFR 835) using appropriate colored rope and postings. These zones may change in size and location as project tasks evolve, based on project monitoring data, and as wind direction changes. Additionally, entrances and egress points may change based on these same factors. Work zones may include

- Support zone (SZ)
- Contamination reduction zone (CRZ), including a contamination reduction corridor (CRC) if radiological hazards are present
- Exclusion zone (EZ).

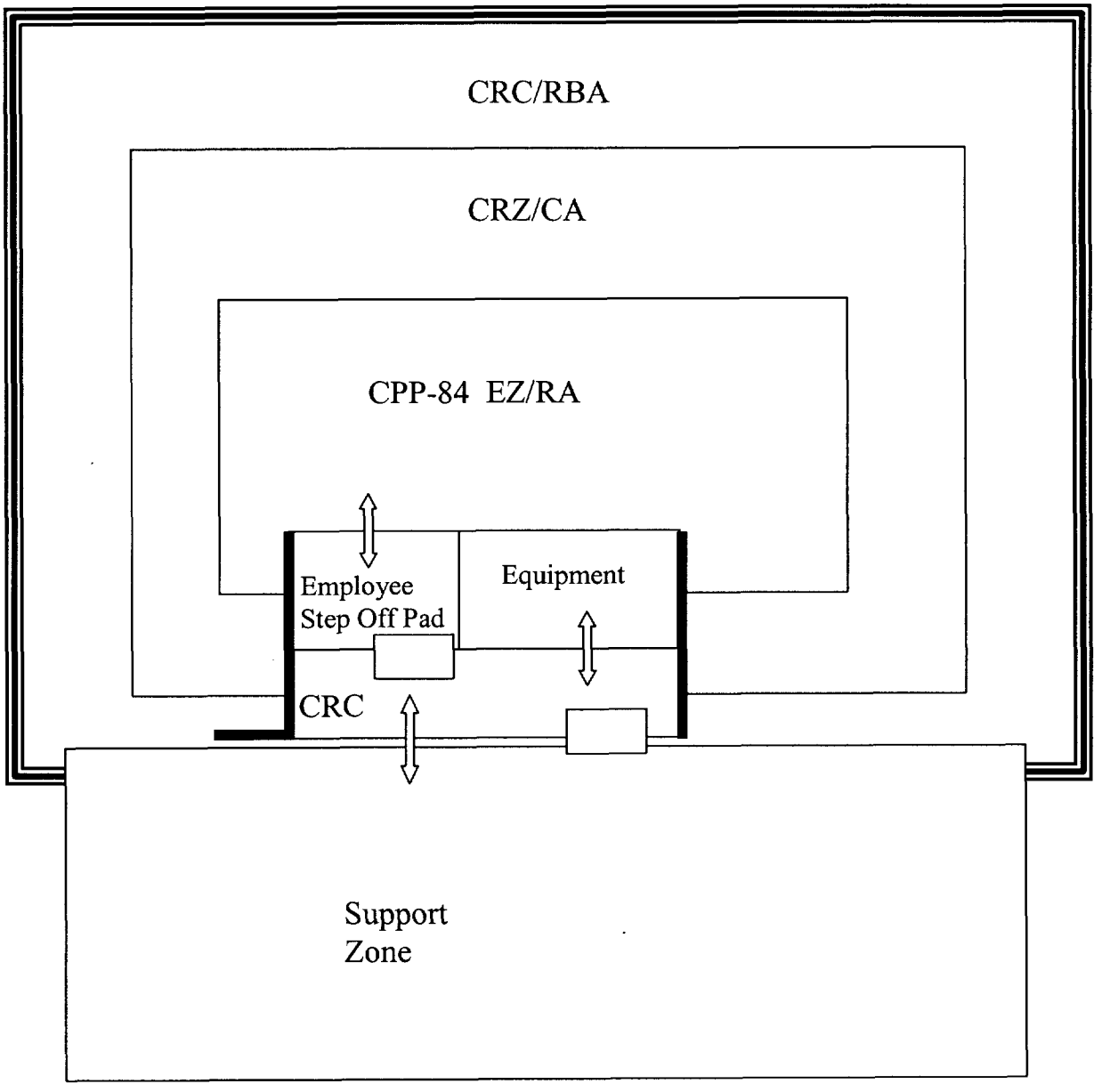

Figure 8-1. Typical configuration of controlled work zones including radiological control areas for Site CPP-84.

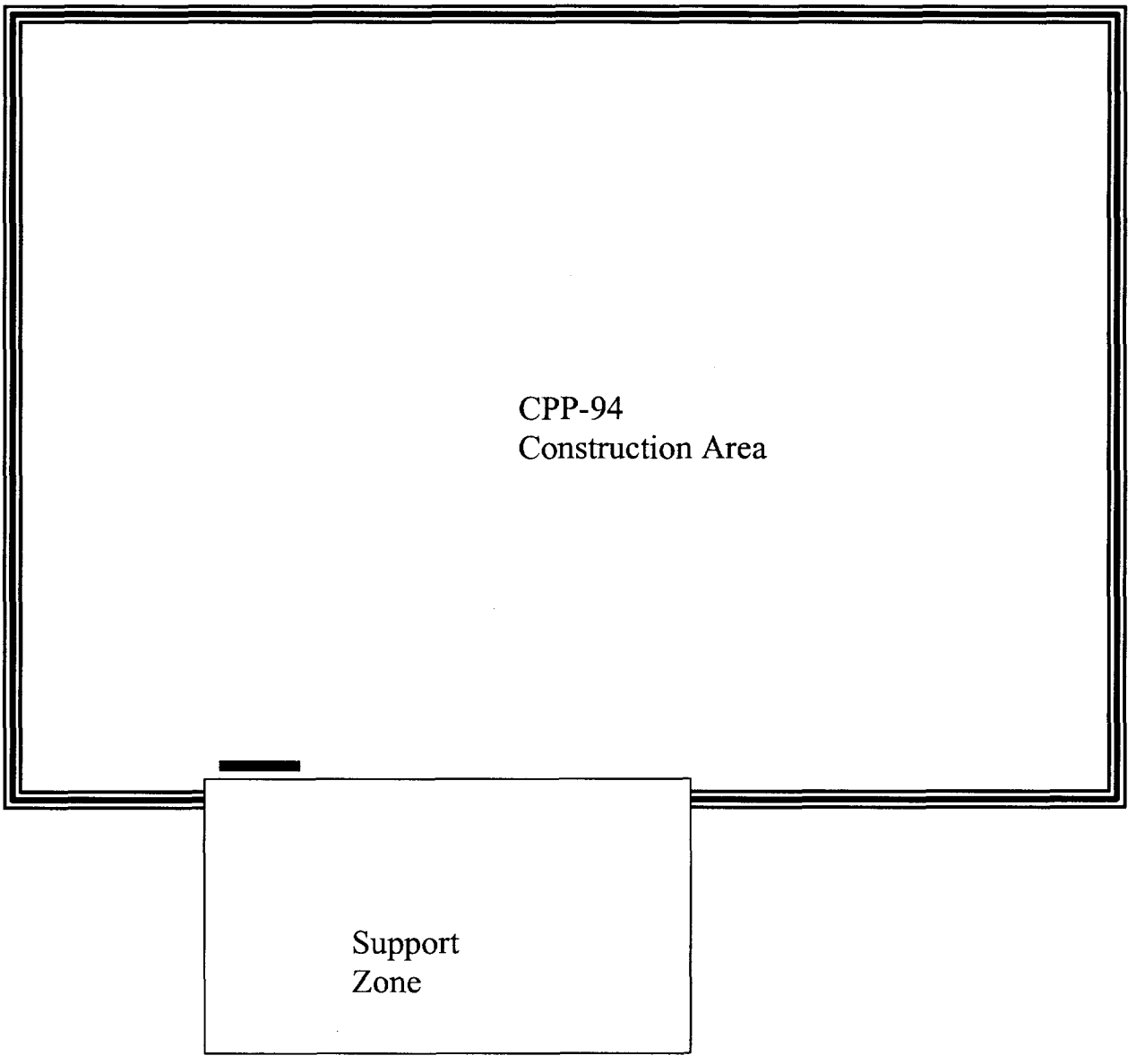

Figure 8-2. Typical example of construction area for Site CPP-94.

8.1 Support Zone

The SZ will be considered a radiological and nonradiological "clean" area. The location of the SZ will be upwind of the EZ (where possible) and readily accessible to the nearest road. The SZ is a controlled area outside the CRZ. Support facilities (project management and RadCon trailers, vehicle parking, additional emergency equipment, extra PPE, and stored monitoring and sampling equipment) will all be located in the SZ. Visitors who have not had appropriate training and have not received site-specific training will be restricted to this zone.

Access beyond the support zone will be signed with the following at a minimum:

- CAUTION; CERCLA/OSHA; 1910.120 HAZWOPER Controlled Area; Authorized Personnel Only; Health and Safety Plan Controlled Area; No Eating, Drinking, Chewing, Smoking, or Application of Cosmetics
- CAUTION; Hard Hats, Safety Glasses, and Sturdy Leather Boots; Hearing Protection Required When Equipment is Operating
- FOR PROJECT INFORMATION CONTACT THE FOLLOWING PERSONNEL, or equivalent signage.

8.2 Contamination Reduction Zone and Corridor

The CRZ and CRC are transition areas surrounding the EZ and are located between the EZ and SZ. The CRZ and CRC will serve to buffer and further reduce the probability of the SZ becoming contaminated. The CRC will encompass an area large enough to allow emergency vehicle traffic. Personnel and equipment entering and exiting the EZ will transition through the CRC. The CRZ and CRC may serve as staging areas for equipment and temporary rest areas for personnel. PPE and sample packaging and preparation equipment will be stored in the SZ. The transfer of contaminating substances from personnel, equipment, or in the air will be minimized by restricting traffic to these controlled areas.

Note: Nonsite personnel are not permitted in the CRZ without proper escort and satisfying the appropriate training requirements for being in the CRZ.

A nonradiological decontamination pad may be established if it is believed that residual nonradiological contamination is present on equipment following release from the contaminated area. The project IH will be responsible for nonradiological contamination issues and determining the most appropriate decontamination methods. A designated portion of the CRC will be established for the nonradiological decontamination of equipment (if required). All decontamination supplies (nonradiological decontamination solution, Teriwipes, etc.) and used nonradiological PPE and debris waste containers may be located in the CRC.

8.3 Exclusion Zone

The EZ will be large enough to encompass the established boundary of the work site. The minimum number of personnel required to safely perform the project tasks will be allowed into the EZ. The EZ is a controlled access zone at all times. The FTL/STR or STR track personnel entry in and exit out of the EZ. The EZ boundary will be delineated with rope and a sign(s) at a minimum and include language similar to the following:

- CAUTION EXCLUSION ZONE.

Note: Nonsite personnel are not permitted in the EZ without proper escort and satisfying the appropriate training requirements for being in the EZ.

Factors considered when establishing the EZ include air monitoring data, radiological contamination data, radiation fields, equipment in use, the physical area necessary to conduct site operations, and the potential for contaminants to be blown from the area. The boundary may be expanded or contracted as this information becomes available. All personnel who enter the EZ will wear the appropriate level of PPE for the degree and type of hazards present.

8.4 Eating and Smoking

Ingestion of hazardous substances is likely when workers do not practice good personal hygiene habits. It is important to wash hands, face, and other exposed skin thoroughly after completion of work and before smoking, eating, drinking, and chewing gum or tobacco. No smoking, chewing, eating, applying lip balm, or drinking is allowed within the EZ, CRZ, or CRC. All smoking polices will be complied with, including disposing of smoking materials in the proper receptacle.

9. OCCUPATIONAL MEDICAL SURVEILLANCE

Task-site personnel will participate in the INEEL occupational medical surveillance program (or equivalent subcontractor program), as required by DOE Order 440.1A, "Worker Protection Management for DOE Federal and Contractor Employees," and 29 CFR 1910.120 or 29 CFR 1926.65. Medical surveillance examinations will be provided before assignment, annually, and after termination of HAZWOPER duties or employment. This includes

- Personnel who are, or may be, exposed to hazardous substances at or above the OSHA permissible exposure limit (PEL), or published exposure limits, without regard to respirator use for 30 or more days per year

- All employees who are injured, become ill, or develop signs or symptoms because of possible overexposure involving hazardous substances or health hazards from an emergency response or hazardous waste operation

- All employees who wear a respirator for 30 days or more a year or as required by "Respiratory Protection" (29 CFR 1910.134).

Personnel who wear a respirator in performance of their job, or who are required to take respirator training to perform their duties under this plan, must participate in the medical evaluation program for respirator use at least annually, as required by applicable company policies and procedures.

A single copy of the project HASP, job hazard analysis requirements, required PPE, confined space entry requirements (as applicable), and other exposure-related information will be made available, upon request, to the INEEL OMP physician (and subcontractor physicians) conducting medical surveillance for employees participating in this project. Exposure monitoring results and hazard information furnished to the OMP physician will be supplemented or updated annually (as stated in Section 9) as long as the employee is required to maintain a hazardous waste and material employee medical clearance. The OMP physician will then evaluate the physical ability of an employee to perform the work assigned.

A documented medical clearance (e.g., a physician's written opinion) will be provided to the employee and line management stating whether the employee has any detected medical condition that would place him or her at increased risk of health impairment from working in hazardous waste operations, emergency response operations, respirator use areas, and confined space areas, as applicable. The physician may impose restrictions on the employee by limiting the amount and type of work performed.

Personnel are responsible for communicating any work or medical restrictions to their supervisor so modified work assignments can be made if necessary. During the applicable company policies and procedures prejob briefing, the supervisor conducting the briefing should ask workers if they have any work restrictions. However, it is the employee's responsibility to inform the supervisor of any work or medical restrictions.

9.1 Subcontractor Workers

Subcontractor project personnel will participate in a subcontractor medical surveillance program that satisfies the applicable requirements of 29 CFR 1926.65. This program must make medical examinations available before assignment, annually, and after termination of hazardous waste duties as stated above. The physician's written opinion, as defined by 29 CFR 1910.120(f)(7) (or equivalent), will serve as documentation that subcontractor personnel are fit for duty or will list work restrictions.

Medical data from the subcontractor employee's private physician, collected pursuant to hazardous material worker qualification, will be made available to the INEEL OMP physicians on request.

9.2 Injuries on the Site

It is the policy of the INEEL that an INEEL OMP physician examine all injured personnel for the following reasons:

- An employee is injured on the job.
- An employee is experiencing signs and symptoms consistent with exposure to a hazardous material.
- An employee is believed to have been exposed to toxic substances or physical or radiological agents in excess of allowable limits during the course of a project at the INEEL.

Note: In the event of an illness or injury, the decision to provide first aid and transport to the nearest medical facility or whether to immediately request an ambulance and continue to stabilize and provide first aid should be based on the nature of the injury or illness and likelihood that transporting the individual may cause further injury or harm. Most likely, the person making this decision will only be trained to the medic first/CPR level and should contact the CFA medical facility at 777 or 526-1515 for further guidance if there is any question as to the extent of injury or potential to cause further harm by movement of the injured individual.

In the event of a known or suspected injury or illness caused by exposure to a hazardous substance or physical or radiological agent, the employee will be transported to the nearest INEEL medical facility for evaluation and treatment, as necessary. The HSO and FTL/STR are responsible for obtaining as much of the following information as is available to accompany the individual to the medical facility:

- Name, job title, work (site) location, and supervisor's name and phone number
- Substance, physical or radiological agent exposed to (known or suspected), and material safety data sheet, if available
- Nature of the incident and injury or exposure and associated signs or symptoms of exposure
- First aid or other measures taken
- Locations, dates, and results of any relevant personal or area exposure monitoring or sampling
- List of PPE worn during this work (e.g., type of respirator and cartridge used).

Further medical evaluation will be determined by the treating or examining physician in accordance with the signs and symptoms observed, hazard involved, exposure level, and specific medical surveillance requirements established by the OMP director in compliance with 29 CFR 1910.120 and/or 29 CFR 1926.65.

Note: In the event of an illness or injury, subcontractor employees will be taken to the closest INEEL medical facility or be transported by INEEL ambulance to have an injury stabilized before transport to the subcontractor's treating physician or off-Site medical facility.

The INTEC shift supervisor and project manager will be contacted if any injury or illness occurs at a project site. As soon as possible after an injured employee has been transported to the INEEL medical facility, the FTL/STR or designee will make notifications as indicated in Table A-1, Appendix A.

9.3 Substance-Specific Medical Surveillance

The contaminant concentrations and potential for exposure in Section 3 indicate that no occupational exposures approaching the regulatory substance-specific action limits are anticipated. Therefore, substance-specific medical surveillance is not anticipated for site workers. If contaminants of concern are identified during site work tasks, exposures will be evaluated and quantified to determine the substance-specific applicability.

If new contaminants of concern are identified during the course of project tasks, then exposures will be evaluated and quantified to determine if a substance-specific standard applies. If regulatory mandated substance-specific standard action levels are triggered, then affected personnel will be enrolled in applicable substance-specific medical surveillance programs.

10. KEY SITE PERSONNEL RESPONSIBILITIES

The organizational structure for this project reflects the resources and expertise required to perform the work while minimizing risks to worker health and safety, the environment, and the public. Key project positions, lines of responsibility, and communication are shown on the organization chart for the Site (see Figure 10-1). This organization chart is not all-inclusive but shows the structure for key resources assigned to complete project tasks. The Clean/Close INTEC program management plan (PMP) and Clean/Close INTEC project-specific project execution plan (PEP) details roles and responsibilities for program personnel above the project manager level. The following text outlines the responsibilities of key site personnel.

A person will be considered onsite when they are present in the support zone, designated work areas, or controlled work areas. If there is no potential for exposure to chemical, radiological, or safety hazards, (e.g., down time) a visitor may be escorted at the project site after receiving a site orientation consisting of

- An overview of the controlled areas at the site and access restrictions
- Potential general site hazards and mitigation
- Required PPE for entry to the site (must be trained to wear required PPE)
- Emergency action to take in case of a take-cover or evacuation alarm.
- Evidence of meeting the minimum training requirements.

Note: Visitors will not be allowed into controlled work areas (even with proper training) during active soil disturbance activities and probing operations to minimize the risk of injury or exposure. The determination as to any visitor's need for access into the controlled work areas during such tasks will be made by the HSO in consultation with the project RCT when radiological controls are being utilized.

A fully trained task-site representative (e.g., FTL/STR or HSO, or a designated alternate) will escort visitors when entering controlled areas of the project site, as site conditions warrant, and as deemed appropriate by the FTL/STR/HSO.

10.1 Task Site Responsibilities

10.1.1 Field Team Leader/Subcontractor Technical Representative

The FTL/STR represents the Clean/Close INTEC, Subproject 6 organization at project site(s) with delegated responsibility for the safe and successful completion of the project tasks. The FTL/STR will manage tasks and execute the applicable field sampling plans, technical procedures, and other project-specific documents. The FTL/STR serves as the lead for all routine monitoring tasks and may temporarily serve as the HSO based on the qualifications and complexity of the activities. The FTL/STR enforces site control, documents activities, and conducts (or may delegate to an appropriately trained alternate) daily prejob briefing at the start of the shift. Health and safety issues must be brought to the attention of the FTL/STR.

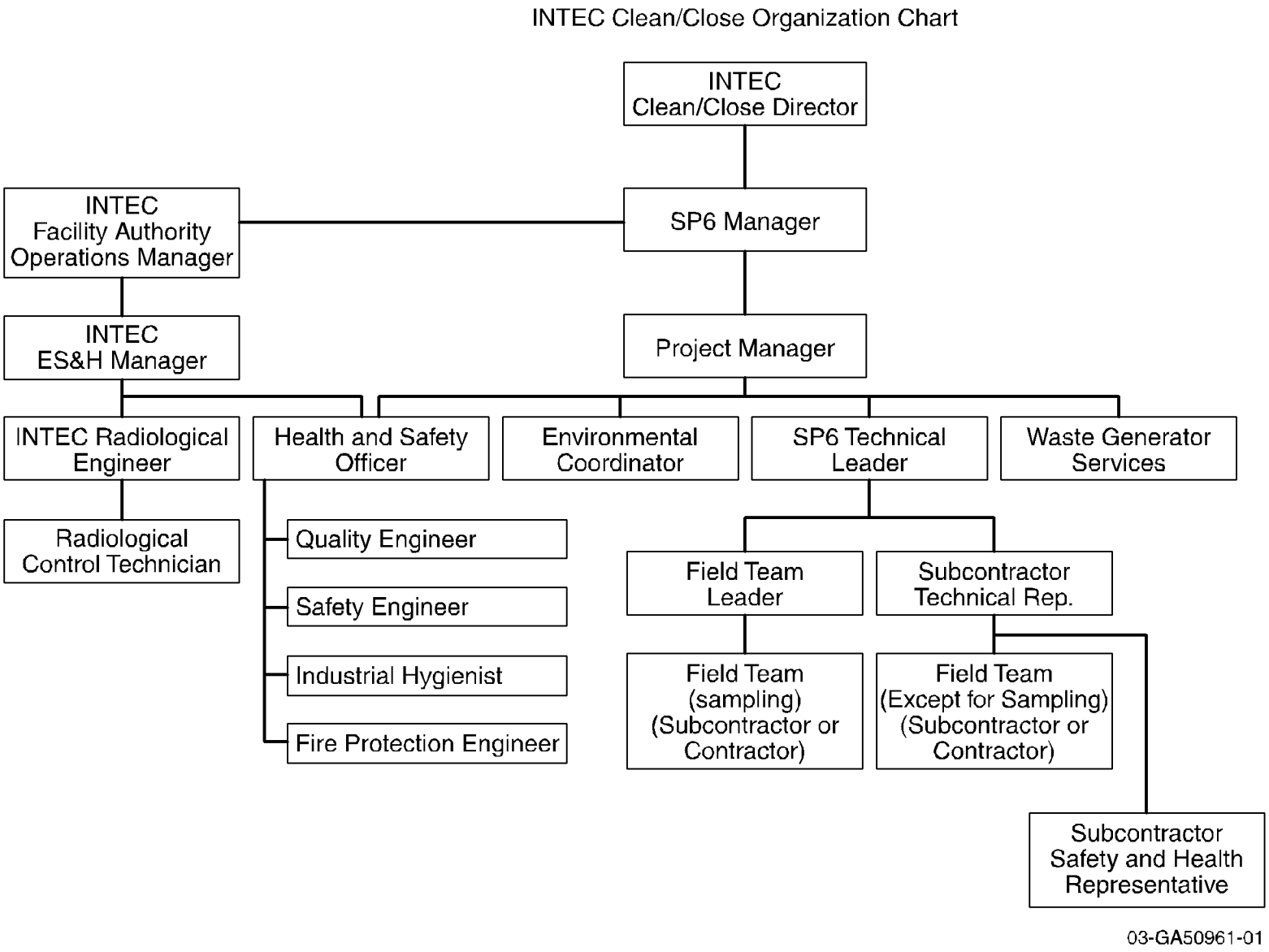

Figure 10-1. Operable Unit 3-13 Group 6, Buried Gas Cylinders, organization chart.

The FTL/STR will report project status on a regular basis to the project manager. Additional responsibilities include, but are not limited to, the following:

- Ensure all field activities are conducted in compliance with technical procedures, work orders, and associated ISMS requirements
- Ensure field team personnel comply with INTEC facility and operations requirements (as applicable)
- Obtain and coordinate resources needed to implement the fieldwork including equipment, labor, administrative, and technical permits with approvals
- Maintain facility interface to schedule routine monitoring tasks through the facility plan of the day (POD)
- Direct subcontract personnel supporting tasks at the project site.

If the FTL/STR leaves the site, an alternate individual will be appointed and that information shall be communicated to all field personnel. Persons acting as FTL/STR must meet all the FTL/STR training requirements outlined in Section 7.

10.1.2 Health and Safety Officer

The health and safety officer (HSO) is a representative of the Clean/Close INTEC organization assigned to the task site who serves as the primary contact for all health and safety issues. The Clean/Close INTEC HSO advises the FTL/STR on all aspects of health and safety and is authorized to stop work at the task site if any operation threatens worker or public health or safety. The Clean/Close INTEC HSO is authorized to verify compliance to the HASP, conduct inspections and self-assessments, require and monitor corrective actions, and monitor decontamination procedures as appropriate. The Clean/Close INTEC safety and health professionals at the task site (e.g., safety professional, industrial hygienist, environmental coordinator, and facility representative) supporting the HSO are from the Clean/Close INTEC organization. If resources are unavailable from the Clean/Close INTEC ES&H organization, Construction Management safety and health personnel may be asked to provide site coverage under the direct control of the Clean/Close INTEC health and safety officer.

Persons assigned as the HSO or alternate HSO must be qualified (in accordance with the definition in 29 CFR 1910.120) to recognize and evaluate hazards and will be given the authority to take or direct actions to ensure that workers are protected. While the HSO may also be the industrial hygienist, safety professional, or, in some cases, the FTL/STR (depending on the hazards and complexity of the activity involved), other task-site responsibilities of the HSO must not interfere with the primary role of the HSO at the task site.

If it is necessary for the HSO to leave the site, an alternate individual will be appointed by the HSO to fulfill this role and that person's identity will be communicated to key project personnel.

10.1.3 Subcontractor Technical Representative

The FTL/STR is the individual matrixed to the Clean/Close INTEC organization representing remedial design/remedial action management at the site, with ultimate responsibility for the safe and successful completion of assigned project tasks. The FTL/STR reports directly to the Clean/Close INTEC Subproject 6 technical lead or project manager. The FTL/STR manages field operations and executes the work plan,

enforces site controls and documents task-site activities, and conducts the daily prejob briefing at the start of the shift. All health and safety issues at the task site must be brought to the FTL/STR's attention. The FTL/STR also will serve as the primary area warden during the project. The FTL/STR must have authorization to utilize Construction Management safety and health personnel to support project activities from the Clean/Close INTEC Subproject 6 health and safety officer or project manager.

If the FTL/STR leaves the project site, an alternate individual may be appointed to act as the FTL/STR. Persons acting as FTL/STR on the project site must meet all FTL/STR training requirements outlined in Section 7 of the project HASP. The identity of the acting FTL/STR will be conveyed to task site personnel, recorded in the daily logbook, and communicated to the facility representative.

If the nature of the fieldwork requires involvement of field team staffing by equipment operators, laborers, or other crafts, a representative from the organization supplying these additional resources interfaces with the FTL/STR to provide work supervision. This person may be designated the job site supervisor (JSS).

10.1.4 Industrial Hygienist

The assigned industrial hygienist from the Clean/Close INTEC organization is the primary source for information about exposure assessments for the project chemical, physical, and biological hazards at the task site. The industrial hygienist assesses the potential for worker exposures to hazardous agents in accordance with companywide safety and health manuals, MCPs, and industry-accepted industrial hygiene practices and protocol. By participating in project planning, the industrial hygienist assesses and recommends appropriate hazard controls for the protection of site personnel, operates and maintains airborne sampling and monitoring equipment, reviews engineering controls for effectiveness, and recommends and assesses the use of PPE as required in this HASP (recommending changes as appropriate).

Personnel showing health effects (i.e., signs and symptoms) resulting from possible exposure to hazardous agents will be referred to an OMP physician by the industrial hygienist, supervisor, or HSO. The industrial hygienist may have other duties at the site as specified in other sections of this HASP or in PRDs or MCPs.

10.1.5 Safety Professional

The assigned Clean/Close INTEC safety professional reviews and authorizes the work packages, observes site activity, assesses compliance with the companywide safety and health manuals, serves as the Clean/Close INTEC HSO on required safety equipment, and recommends solutions to safety issues and concerns that arise at the task site. The safety professional may conduct periodic inspections in accordance with MCP-3449 and may have other duties at the task site as specified in other sections of this HASP or in PRDs and MCPs. Copies of any safety and health inspections will be kept in the project field file.

10.1.6 Radiological Engineer

The assigned Clean/Close INTEC radiological engineer is the primary source for information and guidance relative to the evaluation and control of radioactive hazards at OU 3-13 Group 6, Buried Gas Cylinders sites. If a radiological hazard exists or occurs at a OU 3-13 Group 6, Buried Gas Cylinders site,

the radiological engineer makes recommendations to minimize health and safety risks to site personnel. Responsibilities of the radiological engineer include

- Performing radiation exposure estimates and ALARA evaluations
- Identifying the type(s) of radiological monitoring equipment necessary for the work
- Advising the HSO and RCT of changes in monitoring or PPE
- Advising personnel on site evacuation and reentry.

The radiological engineer may also have other duties to perform as specified in other sections of this HASP, or in accordance with companywide Manual 15B, "Radiation Protection Procedures."

10.1.7 Radiological Control Technician

The assigned RCT is the primary source for information and guidance on radiological hazards that may be encountered during project tasks and controls necessary to mitigate them. Responsibilities of the RCT include the following:

- Performing radiological surveying of the site, equipment, and samples
- Providing guidance for radioactive decontamination of equipment and personnel
- Accompanying the affected personnel to the nearest INEEL medical facility for evaluation if significant radionuclide contamination occurs.

The RCT must notify the FTL/STR and HSO of any radiological occurrence that must be reported, as directed by the INEEL Radiological Control Manual (PRD-183).

10.1.8 Fire Protection Engineer

The Clean/Close INTEC fire protection engineer is available to provide technical guidance to the HSO and FTL/STR about all fire protection issues and may be assigned to review the work packages and conduct preoperational and operational fire hazard assessments. The INEEL fire department also may need to be advised of fuel storage areas (if required) and will provide authorization for all hot work operations performed at the project site during times of high-to-extreme fire danger. The fire protection engineer is required to sign all safe work permits used as hot (radiological) work permits within the jurisdiction of the their facility site area director (SAD).

10.1.9 Sampling Team

The sampling team, if appointed, will consist of the FTL/STR and support personnel and is responsible for the collection, preservation, and shipping of all routine monitoring samples in accordance with the applicable field sampling plan and technical procedures. The industrial hygienist and safety professional will support the sampling team, as required, based on site-specific hazards and task evolutions. The sampling team will be led by a sampling FTL/STR who also may perform other roles during the project. Bulk waste sampling is not anticipated on OU 3-13 Group 6, Buried Gas Cylinders remediation sites.

10.1.10 Specialty Subcontractors

Specialty subcontractors may be used to support equipment maintenance or waste stream characterization, handling, and shipping. A subcontractor lead will serve as the single point of contact for all subcontractor communication at the site and will report to the FTL/STR for all technical direction and interface issues at the project site. Subcontractor personnel will report any health and safety issues that arise to the HSO and FTL/STR who may stop work if an unsafe condition exists. The subcontractor lead will also be asked to provide hazard identification and mitigation information about the nature of their equipment or operations during the prejob briefing meeting and will participate in job-site hazard walkdowns where appropriate.

10.1.11 Field Team Personnel

All field team personnel, including facility and subcontractor support personnel assigned to the project, will understand and comply with the requirements of this HASP. The FTL/STR (or designee) will conduct a formal prejob briefing at the start of each shift. During the prejob briefing, all daily tasks, associated hazards, hazard mitigation (e.g., engineering and administrative controls, required PPE, and work control documents), and emergency conditions and actions will be discussed. Input from the project HSO, industrial hygienist, and safety personnel (where assigned) will be provided to clarify task health and safety requirements. All project personnel are encouraged to ask questions about site tasks and provide suggestions on ways to perform required tasks in a more safe and effective manner based on the lessons learned from previous similar activities.

Once at the project site, field team personnel are responsible for identifying potentially unsafe situations or conditions to the HSO and FTL/STR with associated corrective action.

Note: If it is perceived that an unsafe condition poses an imminent danger, site personnel are encouraged and authorized to stop work immediately and notify the HSO and FTL/STR of the unsafe condition.

10.1.12 Nonfield Team Personnel

All persons who may be at a project site and are not part of the field team (e.g., surveyors or others not assigned a field team support role) are considered nonfield team personnel as defined by this HASP. A person will be considered onsite when they are present in the support zone, designated work areas, or controlled work areas.

Nonfield team personnel are considered occasional site workers in accordance with the HAZWOPER and must receive site-specific HASP training in addition to 24-hour HAZWOPER training, and required training outlined in Table 7-1 at a minimum, before entering work areas at the project site. A site supervisor (e.g., HSO or FTL/STR) will supervise nonfield team personnel who have not completed their 3 days of supervised field experience in accordance with the HAZWOPER requirements.

10.1.13 Visitors

All visitors with official business at the project site (including ICP personnel, representatives of DOE, and state or federal regulatory agencies) may not proceed beyond the support zone unless the following requirements are met:

- Receive site-specific HASP training or hazard briefing based on specific tasks taking place

- Sign a HASP training roster and providing proof of having met all training requirements specified in Section 7 (or required access training for the area to be visited when project tasks are not being conducted)

- Participate in a prejob briefing in accordance with MCP-3003

- Provide objective evidence of PPE training and wearing the appropriate PPE for the area of the site to be accessed (29 CFR 1910.132)

- Meet or exceed the training requirements outlined in Table 7-1 of this project Health and Safety Plan.

If there is no potential for exposure to chemical, radiological, or safety hazards (e.g., down time) a visitor may be escorted at the project site after receiving a site orientation consisting of

- An overview of the controlled areas at the site and access restrictions

- Potential general site hazards and mitigation

- Required PPE for entry to the site (must be trained to wear required PPE)

- Emergency action to take in case of a take-cover or evacuation alarm.

Note: Visitors will not be allowed into controlled work areas (even with proper training) during active soil removal activities and hoisting operations to minimize the risk of injury or exposure. The determination as to any visitor's need for access into the controlled work areas during such tasks will be made by the FTL/STR/HSO in consultation with the project RCT as appropriate.

A fully trained task-site representative (e.g., FTL/STR or HSO, or a designated alternate) will escort visitors when entering controlled areas of the project site, as site conditions warrant, and as deemed appropriate by the FTL/STR/HSO.

A casual visitor to the task site is a person who does not have a specific task to perform or other official business to conduct at the project site. Casual visitors are not permitted in work zones or designated work areas at any project site.

10.2 Facility (INTEC) Responsibilities

10.2.1 Clean/Close INTEC Subproject 6 and INTEC Interface

The Clean/Close INTEC Subproject 6 (SP-6) FTL/STR serves as the point of contact for work coordination. The Clean/Close INTEC Subproject 6 FTL/STR provides advance notice to the project management team (PMT) of scheduled activities (including documents requiring facility review or approvals) that impact site area operations and provides advance notice of site area operations that may impact Clean/Close INTEC SP-6 project activities.

10.2.2 INTEC Work Authorization

The INTEC Clean/Close director is responsible for all operational activities at the INTEC and must be cognizant of work being conducted in the facility. The Clean/Close INTEC SP-6 project manager is

responsible for evaluating all activities with respect to the OU 3-13 Group 6, Buried Gas Cylinders safety authorization and for approving all work packages and JSAs. The Clean/Close INTEC SP-6 project manager will be kept informed of the project status through the FTL/STR and Clean/Close INTEC SP-6 task leader, and the facility plan of the day (POD) for activities performed at the INTEC.

All activities will be scheduled through the facility as well as through work packages and procedures and will be opened daily as required. The FTL/STR (or designee) will provide authorization (i.e., signature on work order or technical procedure) to initiate daily activities.

Clean/Close INTEC Subproject 6 provides project safety and health support for field activities and reports to the OU 3-13 Group 6, Buried Gas Cylinders, project manager.

10.3 Project Management Team

The project management team (PMT), headed by the INTEC Clean/Close director, is responsible for the development and management of the project and the coordination of project operations. The PMT ensures that operations, Federal Facility Agreement and Consent Order (DOE-ID 1991) compliance support, surveillance, and monitoring activities are conducted in accordance with INEEL applicable MCPs, and program requirements documents (PRDs), all applicable OSHA, U.S. Environmental Protection Agency, DOE, U.S. Department of Transportation, and State of Idaho requirements, and that tasks comply with PLN-694, "Program Management Plan for the Balance of INEEL Cleanup Project," and this HASP. The PMT is responsible for the overall work scope, schedule, and budget for this project.

11. DECONTAMINATION PROCEDURES

During field activities at CPP-84 and CPP-94, a wash station will be available to field personnel for washing their hands and faces. (If unanticipated contaminants are discovered, such as radiological contamination, revised decontamination procedures will be implemented to address the hazard.) All personnel will use the wash station following sampling, screening, or surveying activities. Additional information describing the importance and types of decontamination procedures is provided below.

11.1 Contamination Control and Prevention

Everything that enters the established contamination area has the potential of becoming contaminated. Contamination control and prevention procedures will be implemented throughout the project to minimize personnel contact with contaminated surfaces. As applicable, the following contamination control and prevention measures will be employed:

- Identify potential sources of contamination and design containment, isolation, and engineering controls to eliminate or mitigate the contact or release of contaminants.
- Limit the number of personnel, equipment, and materials that enter the contaminated area.
- If contamination is found on the outer surfaces of equipment, immediate decontamination procedures will be implemented to prevent the spread of contamination.
- Utilize only the established control entry and exit point from the contaminated area to minimize the potential for cross-contamination and expedite contamination control surveys.
- Wear disposable outer garments and utilize disposable equipment (where possible).

11.2 Personnel and Equipment Decontamination

Decontamination procedures for personnel and equipment are necessary to control contamination and protect personnel. Both chemical and radionuclide contamination will be decontaminated from surfaces at the exit from the contaminated area and other work zone transition boundaries (CRZ or contaminated area for nonradiological, nonhazardous materials, as appropriate).

11.2.1 Personnel Decontamination

Engineering controls, in conjunction with project contamination prevention and control practices, and proper protective clothing donning and doffing procedures will serve as the primary means to eliminate the need for personnel decontamination. Procedures for donning and doffing protective clothing will be posted at the entrance and exit to all radionuclide contamination areas established. Following the donning of protective clothing, the worker's buddy, the FTL/STR, HSO, and/or RCT will check to verify proper donning technique. The greatest potential for personnel contamination exists when performing sampling, removal, treatment, or transfer of compressed gas cylinder contents; when IH/RCT are surveying and sampling/monitoring; and from improper doffing of contaminated protective equipment (during a containment failure scenario only) when exiting a contaminated area.

Two decon stations may be established to provide access in two directions depending on wind directions at time of EZ exit.

The PPE selection, as identified in Section 6 of this Health and Safety Plan, will provide for the layered barriers required to prevent permeation and minimize external surface contamination. The IH and/or RCT will provide guidance on decon procedures to follow in case of personnel contamination. The HF decon emergency kit will be onsite in case of personnel contact. Site personnel must be trained on its proper use. Radiological decontamination guidelines are considered adequate for chemical decontamination; therefore, the requirements of MCP-148, " Personnel Decontamination," will be followed as necessary.

11.2.2 Decontamination in Medical Emergencies

If a person is injured or becomes ill, they will immediately be evaluated by first-aid-trained personnel at the project task site. If serious, then the FTL/STR will contact the Warning Communications Center (WCC) to summon emergency services to the project. Also, others will be contacted, as stated in Section 12.

Medical care for serious injury or illness will not be delayed for decontamination. The IH and/or RCT (depending on the type of contamination) shall accompany the employee to the medical facility to provide information and decontamination assistance to medical personnel. Company Manual 15A, Chapter 5, "Radiological Health Support Operations," and MCP-148, "Personnel Decontamination," contain information on proper handling of radionuclide-contaminated wounds.

11.2.3 Equipment Decontamination

Containment engineering and isolation controls are used to prevent contamination. These engineering controls will serve to isolate and eliminate or mitigate many of the potential contamination pathways to prevent equipment contamination and greatly reduce the need for decontamination. Project IH and RadCon personnel will conduct surveys and collect swipes throughout the sampling, treatment, and removal tasks in accordance with the TPRs to evaluate engineering controls, material handling methods, and containment integrity.

Both real-time instrumentation and visual observation can be used to detect contamination. Where radiological and IH concerns do not prohibit their use, Company Manual 8, "Environmental Protection and Compliance"; SOP-11.4, "Field Decontamination of Heavy Equipment, Drill Rigs, and Drilling Equipment"; and SOP-11.5, "Field Decontamination of Sampling Equipment," will be followed. The RadCon and IH personnel will evaluate any contaminated equipment to determine the most appropriate decontamination method based on the nature of the contaminated item, level of contamination, required effort to decontaminate the item, and requirement for decontaminating versus disposing of such items. In some cases, the level of effort and potential for spreading contamination from conducting decontamination tasks far outweigh the benefit from engaging in extensive decontamination efforts to return an item to service. A cost-benefit versus ALARA evaluation will be done on items that have extensive contamination or are relatively inexpensive. Low-cost consumable items will be discarded if initial decontamination efforts fail or extensive decontamination is required that is not in accordance with ALARA principles.

For nonradionuclide decontamination of free-released equipment, a decontamination pad may be established in the CRC. If it is deemed necessary and appropriate by the project IH, then a wet wiping with the amended water solution or potentially steam cleaning of this equipment prior to leaving the CRC may be conducted. If steam cleaning is performed, a drainage system that allows for a single collection point will be established. Decontamination wastewater will be collected using a submergible pump and containerized/characterized in accordance with company Manual 8.

11.3 Disposal of Contaminated PPE and Equipment

11.3.1 Storage and Disposal of Contaminated Materials

All wastes generated by this remediation action will be managed in accordance with the Waste Management Plan (DOE-ID 2003).

11.3.2 Project Sanitation and Waste Minimization

Potable water and soap will be available at the site for personnel to wash their hands and faces upon exiting the work area. It is important to note that any required radionuclide contamination surveys must be performed before washing face and hands to prevent accidental spread of contamination.

Waste materials will not be allowed to accumulate at the project. Appropriate containers for contaminated and noncontaminated waste will be maintained at step-off areas, in the SZ, and at other appropriate locations at the project. All radioactive contaminated waste will be surveyed by the RCT before removal from the project. Personnel should make every attempt to minimize waste through judicious use of consumable materials. All project personnel are expected to make good housekeeping a priority at the project.

12. EMERGENCY RESPONSE PLAN

This section defines the responsibilities of the project and the INEEL Emergency Response Organization (ERO) by providing guidance for responding to abnormal events during project activity. The project emergency contact list is provided in Appendix A. Changes to this contact list will not necessitate a change in the document as long as the changes are communicated to the project personnel and the updated contact list is posted at the job site immediately upon change. Per MCP-2725, "Field Work at the INEEL," the CFA ERO will ensure personnel performing field work are notified via radio and/or pager of emergency conditions and the appropriate actions to take. As such, the FTL/STR or HSO must be available and able to communicate with field workers at all times. At each site, the routes to CFA medical facilities will be reviewed. An operational emergency evacuation drill will be conducted prior to beginning field work.

This emergency response plan addresses OSHA "emergency response" as defined by 29 CFR 1910.120/1926.65 and DOE "emergencies" as defined by DOE Order 151.1B, "Comprehensive Emergency Management System," and DOE Order 232.1A, "Environment, Safety, and Health Reporting." This response plan is implemented in concert with PLN-114, "INEEL Emergency Plan/RCRA Contingency Plan."

The INEEL Emergency Plan/RCRA Contingency Plan may be activated in response to events occurring at the INEEL, at the project site, or at the discretion of the emergency action manager (EAM). Once the INEEL plan is activated, project personnel will follow the direction and guidance communicated by the EAM.

12.1 Field Worker Personnel Accountability

In the event of an emergency, employees working during the back shift should take the following protective action:

- Local Alarm—Evacuate the area and report to FTL/STR. The FTL/STR will report to the responding FD officer at the support zone where all personnel will assemble. This will be discussed in the pre-job briefing.

- Take Cover Siren (steady siren)—Take cover in vehicle/trailer, if available, contact INTEC plant shift supervisor (PSS)/EAM (526-3100 or 526-4452), and report your location and phone number for further guidance. The INTEC PSS/EAM will contact the CFA EAM and provide status of project personnel.

- Evacuation Siren (alternating siren)—Evacuate your area, report to the INTEC West Guard Gate, and await directions from the INTEC PSS/EAM. The INTEC PSS/EAM will contact the CFA EAM and provide status of project personnel.

For questions, call the CFA emergency planner at 526-2226 or INTEC emergency planner at 526-0397.

Note: The OSHA term "emergency" is not defined the same as the DOE term "emergency." For simplicity, the term "emergency" is used in this section of the HASP to refer to events covered by either the OSHA or the DOE definition.

Emergency response plans that must be completed before starting the project include

- Designate emergency warning signals and evacuation routes
- Implement personnel accountability procedures
- Identify emergency medical services and personnel charged with performing those services
- Establish effective project communications
- Establish requirements for emergency equipment and supplies
- Establish the preferred means for notifying the INEEL ERO of abnormal events.

All emergencies will be reported through the WCC (526-1515) for notifications to the CFA and INTEC EAMs and the Fire Alarm Center. If the INEEL ERO is activated, site emergency response will follow the INEEL "Emergency Plan/RCRA Contingency Plan." On-scene response to and mitigation of site emergencies could require the expertise of both site personnel and INEEL FD personnel. Emergencies that could occur include

- Accidents resulting in injury
- Accidents resulting in radiological exposure
- Fires
- Explosions
- Spills of hazardous/radiological materials
- Rupture of gas cylinder
- Tornadoes, earthquakes, and other adverse natural phenomena
- Vehicle or transportation emergencies
- Safeguard and security emergencies
- Emergencies at nearby facilities that could prompt evacuation or take-cover actions.

12.2 Types of Emergency Events

12.2.1 Events Requiring Emergency Notifications

Certain events require courtesy notifications but do not require a response from the INEEL ERO. In these cases, the project FTL/STR or designee will notify the INTEC PSS, CFA facility manager, and WCC. BBWI/subcontractor project and department personnel, DOE, and other appropriate parties may be contacted if applicable. The FTL/STR's notification should describe the event and state that no emergency response support is required. Examples of these types of events include but are not limited to the following:

- Personal injury at the project requiring medical evaluation or treatment but does not require an ambulance response
- Personnel contamination or suspected uptake of radiological or hazardous substance
- Equipment or vehicle accident that results in damage to the vehicle and/or property ONLY
- Failure of an engineering control or isolation that results in only localized contamination within the established radiological controlled area
- Unexpected high radiation dose to personnel (>ALARA goal)
- Small fire that is controlled with a hand-held fire extinguisher
- Any spill as defined by MCP-3480, "Environmental Instructions for Facilities, Processes, Materials, and Equipment"
- Any other deemed potentially reportable
- Cylinder rupture.

In the event of cylinder rupture where anhydrous HF is released, project personnel shall immediately evacuate the area upwind a minimum of 2 km (1.3 mi). Once at a safe distance, institute emergency notifications identified in Section 12.6.4 of this HASP.

12.2.2 Events Requiring Local Project Evacuation and/or INEEL ERO Response

Some events that could occur at the project may require support from the CFA ERO or may require a local area evacuation of the project. In these cases, the project FTL/STR or designee will immediately notify the WCC. WCC will contact the CFA EAM and INTEC PSS. The FTL/STR will also notify BBWI/subcontractor project and department personnel and other appropriate parties. The FTL/STR's notification will describe the event and will request emergency response resources as appropriate. After being informed of the event, the EAM may elect to activate the facility emergency control center. Once the emergency control center is declared operational, all emergency response activities will be coordinated through the appropriate EAM. Examples of these types of events include, but are not limited to, those listed below:

- A fire that is beyond an incipient stage and that cannot be extinguished with hand-held extinguishers
- Large spill at the project that cannot be immediately contained or controlled
- Small episodic airborne release beyond the controlled area
- Serious injury to a worker or workers.

12.2.3 Events Requiring Total Facility and Project Evacuation

In the event that a facility evacuation requires the project to evacuate, the FTL/STR or designee shall be notified to evacuate all project personnel. The EAM is responsible for ordering a total area

evacuation protective action. If the event causing the evacuation of the project originates at INTEC, the INTEC PSS/EAM is responsible to make protective actions to the FTL/STR.

Note: When an evacuation is called for by the EAM, the FTL/STR is the designated project area warden who will ensure that the designated area warden coordinator at the INTEC west assembly area has been notified that all project employees have been evacuated and accounted for.

12.3 Emergency Facilities and Equipment

Emergency response equipment that will be maintained at the site includes the items described in Table 12-1. Figure 12-1 shows the routes to the CFA Dispensary. The INEEL FD maintains emergency vehicles that can be used to respond to an event or emergency at the project. FD personnel are also trained to provide immediate hazardous material spills and medical services. At least two persons with current medic/first aid training will be present at the project to render first aid as required.

Fire extinguishers and first aid supplies are minimum requirements for all sites, including those in the field. Other items must be considered and should be present at that site or readily available if they could be needed.

Table 12-1. Emergency response equipment to be maintained at the site.

Equipment Name and Quantity Required	Location at Task Site	Responsible Person	Frequency of Inspection
One ABC fire extinguisher[a] or shovel (per vehicle)	Vehicle or SZ	FTL/STR/HSO/IH	Weekly
First aid supplies	Vehicle or SZ	FTL/STR/HSO/IH	Weekly
Hydrofluoric acid burn kit[b]	Vehicle or SZ	FTL/STR	Weekly
Portable eyewash station	Vehicle or SZ	FTL/STR	Daily
Communications: one pager, one cell phone, and two-way radio (narrowband) per team	At project site	FTL/STR	Daily
Air horn	At project site	FTL/STR	Daily

a. Consult the assigned BBWI safety and fire protection engineer to determine appropriate type and quantity of fire extinguisher(s).
b. Hydrofluoric acid burn kit will be available onsite if HF is discovered for accidental skin contact (Site CPP-84 only). Train personnel (at least two people onsite) on proper use.

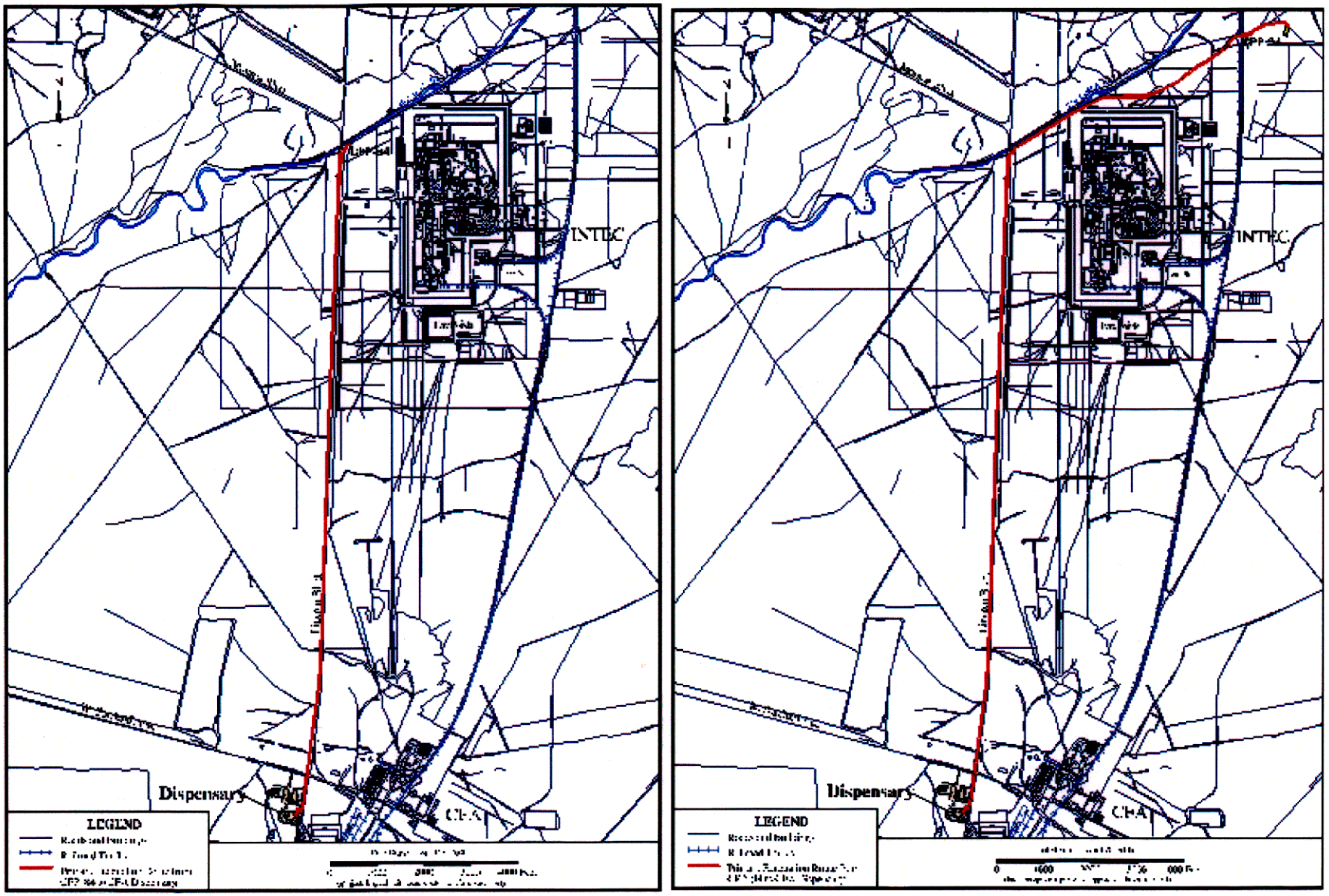

Figure 12-1. Routes to the CFA Dispensary from CPP-84 and CPP-94—NOTE: Delete CPP-94.

12.4 Emergency Communications

In the event of an emergency, the capability to summon INEEL emergency response resources, to immediately notify site personnel, and to inform others of site emergencies is required. Communications equipment at the task site will be a combination of pagers, radio ("H INL OSC"), and/or telephones (mobile, cellular, or facility).

The following, as necessary, will be used for emergency situations:

- TO GET HELP FROM THE INEEL FD, PROJECT PERSONNEL WILL USE RADIO COMMUNICATIONS (H INL OSC) OR WILL CALL THE INEEL WCC AT 526-1515.
- Radio communications and/or cellular phone to notify field personnel to stop work and evacuate the site.
- Radio communications and/or cellular phone to notify field personnel to stop work and take cover.

The project contact list is provided in Appendix A. Changes to this contact list will not necessitate a change in the document as long as the changes are communicated to the project personnel and the updated contact list is posted at the job site immediately upon change.

Site personnel will provide the following information, as available, when communicating emergency information to the INEEL site emergency telephone number, the WCC, or the point of contact:

- The caller's name, telephone number, pager number
- Exact location of the emergency
- Nature of the emergency, including time of occurrence, current site conditions, and special hazards in the area
- Injuries, if any, including numbers of injured, types of injuries, conditions of injured
- Additional information as requested.

12.5 Emergency Response Roles and Responsibilities

12.5.1 INEEL and CFA EROs

The INEEL ERO structure is based on the Incident Command System (ICS). The ICS is an emergency management system designed for use from the time an incident occurs and is responded to until it is terminated. The system consists of procedures for controlling personnel, facilities, equipment, and communications. It allows for activating emergency response resources in a graded approach depending on the nature and seriousness of the event. The ICS is implemented as a chain of command operating on three basic levels: on-scene commander (OSC), the area Emergency Control Center, and the INEEL Emergency Operations Center.

12.5.1.1 On-Scene Commander (OSC). The OSC (per PLN-114, Emergency Response Organization) has the tactical and command responsibility for the control of an emergency situation at the scene, a fire, and a hazardous material response and as a special rescue response. The senior FD officer

responding for the INEEL FD fills this position. If the event is primarily a security incident, the senior responding protective forces officer will assume the duties of the OSC.

The project FTL/STR, or designated replacement, shall take immediate actions to

- Understand the potential outcomes associated with an emergency when hazardous substances are present
- Understand what hazardous substances are and the risks associated with them in an incident
- Recognize the presence of hazardous substances in an emergency
- Identify the hazardous substances if possible
- Realize and understand the need for additional resources.

12.5.1.2 Facility Emergency Control Center. The facility Emergency Control Center is the second tier of the emergency response line organization and is headed by the EAM. The EAM is responsible for all emergency response actions within the entire facility, including advising the OSC. The Emergency Control Center is activated for actual or potential emergencies or at the direction of the EAM. If the Emergency Control Center is activated in response to an event at the project, then the project will send a representative to the Emergency Control Center to advise the EAM.

12.5.1.3 Emergency Operations Center. The Emergency Operations Center is the upper tier of the ERO and is headed by the INEEL emergency director. The emergency director is responsible for all emergency response actions at the INEEL, including advising the EAM. Project personnel do not normally provide direct support to the Emergency Operations Center.

12.5.2 Project Personnel Involved in Emergencies

12.5.2.1 FTL/STR. The FTL/STR is responsible for initiating all requests for emergency services (fire, medical, etc.) and for notifying the appropriate facility management of abnormal or potential abnormal events occurring on the project. The FTL/STR, or designee, serves as the project area warden. The FTL/STR in this capacity will report the accountability for all employees when an emergency evacuation is called to the CFA personnel accountability leader (PAL) or the INTEC PSS on the backshift. Additionally, the FTL/STR will control the scene at the first responder awareness level until relieved by a higher-tiered ICS authority arrives at the scene to take control as the OSC. While maintaining control of the scene, from a protected, controlled distance, the FTL/STR shall maintain communication with the EAM when the system is in place.

12.5.2.2 Project Personnel. Every person at the project has a role to play during an event or INEEL emergency (Table 12-2). Each employee must be constantly aware of potential problems or unexpectedly hazardous situations by immediately reporting these situations to the FTL/STR or designated representative. All employees are expected to watch out for their fellow workers, to report their concerns to the FTL/STR or designated representative, and to respond to emergency events as provided for in this HASP.

Table 12-2. Responsibilities during an emergency.

Responsible Person	Action Assigned
FTL/STR	Contact the INEEL site emergency telephone number or the WCC
FTL/STR	Signal evacuation or take cover
Any field personnel trained in medic/first aid	Provide first aid
HSO	Report occupational injuries/illnesses to the OMP
Any field personnel trained in the use of fire extinguishers	Extinguish fires (incipient fires only)
FTL/STR	Report all fires to the INEEL FD
IH	Respond to releases in a defensive fashion without trying to stop the release, contain release from safe distance, keep from spreading, and prevent exposure
HSO	Report spills to the INEEL Spill Notification Team
HSO	Assemble industrial safety/industrial hygiene/RadCon team
FTL/STR	Contact the INTEC plant shift supervisor
FTL/STR	Contact the emergency action manager
FTL/STR	Contact the CFA emergency planner

12.6 Emergencies, Recognition of Warnings, and Response

12.6.1 Emergency Recognition and Response

All site personnel should be constantly alert for signs of potentially hazardous situations, including signs and symptoms of chemical or radiological exposures or releases. Site personnel will be trained on the methods, signals, and alarms used to convey EVACUATION and TAKE COVER and on immediate response actions. Recognition and response actions may include the following:

- For an EVACUATION of the project, personnel will assemble at project vehicles for transportation to the evacuation area at the INTEC west assembly area (bus parking lot under Other/Visitor) or to another area as communicated to field personnel from the EAM.

- For a TAKE COVER at the project, project personnel will take cover in the vehicle, if appropriate, or follow guidance from the applicable EAM.

- TO GET HELP FROM THE INEEL FD, PROJECT PERSONNEL WILL USE RADIO COMMUNICATIONS (H INL OSC) OR WILL CALL THE INEEL WCC AT 526-1515.

- At least two persons with current medic/first aid training will be present at the project to render first aid. For serious injury, assistance from the INEEL FD will be summoned. All occupational injuries/illnesses will be reported promptly to the INEEL OMP at 526-1596.

NOTE: ALL FIRES OF ANY SIZE WILL BE REPORTED PROMPTLY TO THE INEEL FD EVEN IF PROJECT PERSONNEL HAVE EXTINGUISHED THE FIRE.

- For incipient fires, project site-trained personnel may use a fire extinguisher and shovel to extinguish the fire. For fires that cannot be handled with hand-held extinguishers, assistance from the INEEL FD will be summoned.

- For spills of hazardous/radiological material, project personnel will not expose themselves to hazardous conditions beyond their training and qualification for HAZWOPER. If abnormal radiological situations are present, then MCP-124, "Response to Abnormal Radiological Situations," will be followed.

ALL SPILLS WILL BE REPORTED PROMPTLY BY THE FTL/STR OR DESIGNEE, TO THE INEEL SPILL NOTIFICATION TEAM AT PAGER #6400. THE FTL/STR WILL ALSO ENSURE THE CFA EAM AND INTEC PSS ARE INFORMED OF SPILLS.

- For large spills at the project (55+ gal), assistance from the INEEL FD will be summoned.

- If spills are small enough to be safely contained at the project, spill control will be handled by project personnel, who will take the following immediate spill response actions:

  - Untrained site personnel (or if the material characteristics are unknown) shall

    – Evacuate and isolate the immediate area

    – Seek help from and warn others in the area

    – Notify the FTL/STR and the HSO.

  - Trained site first responders at the awareness level shall

    – Seek help from and warn others in the area

    – Stop the spill, if it can be done without risk (for example, return the container to the upright position, close valve, shut off power)

    – Provide pertinent information to the assigned point of contact, FTL/STR, or HSO.

An operations drill will be conducted at the start of project activity. The purpose of the drill is to familiarize employees with their respective emergency response actions. Additional drills may be conducted at the discretion of the project. Any radio or telephone communications that are included in drills shall be immediately preceded and followed with the statement that "This is a drill." Each drill or actual emergency at the task site will be followed by a critique, and any deficiencies that are identified in the response plan, procedures, or actions will be corrected.

12.6.2 Alarms

Alarms and signals are used to notify personnel of abnormal conditions that require a specific response. These include radiation-monitoring alarms denoted by fast ringing bells and fire alarms, which vary from building to building. Responses to these alarms are addressed in the general employee training. Actions to be taken by project personnel in response to INTEC TAKE COVER and EVACUATION alarms are described below.

12.6.2.1 Take Cover. Radioactive and hazardous material releases, weather conditions, or other event or emergency conditions may require that all personnel take cover indoors in the nearest building or, if outdoors, in nearest vehicle, until further guidance is received. A TAKE COVER protective action may be initiated as part of a broader response to an emergency situation and may precede an evacuation order. The order to TAKE COVER is usually announced by activating the facility emergency siren. The signal to take cover is a CONTINUOUS SIREN that can be heard at the facility area. Remember, STEADY = STAY. But the order to take cover can also be given by word of mouth, radio, or voice paging system. When ordered to TAKE COVER, project personnel shall place the site in a safe condition (as appropriate) and seek shelter in the nearest available building. Vehicles may be used for shelter if there are no buildings nearby. Eating, drinking, and smoking are not permitted during take cover conditions.

12.6.2.2 Total Area Evacuation. A total area evacuation is the complete withdrawal of personnel from the Site and the entire facility. Remember, ALTERNATE = EVACUATE. A single long blast of the air horn serves as the project's alternate emergency evacuation alarm. But the order to evacuate can also be given by word of mouth, radio, or voice paging system. When ordered to EVACUATE, project personnel shall place the project in a safe condition (as appropriate) and then proceed along the specified evacuation route to the designated assembly area, or as directed by the EAM. Eating, drinking, and smoking are not permitted during emergency evacuations.

12.6.2.3 Local Area Evacuation. A local area evacuation is the complete withdrawal of personnel from the site, but it does not require the complete evacuation of the facility. A single long blast of the air horn serves as the project's emergency evacuation alarm. But the order to evacuate can also be given by word of mouth, radio, or voice paging system. When ordered to evacuate, the local area project personnel shall place the site in a safe condition (as appropriate) and then proceed along the specified evacuation route to the assembly area designated for local area evacuations, or as directed by the FTL/STR. Eating, drinking, and smoking are not permitted during emergency evacuations.

12.6.3 Personnel Accountability/Area Warden

Project personnel are required to evacuate the site in response to TAKE COVER, EVACUATION, and local evacuation alarms. In each case, the project area warden shall account for the people present on the site at the time the alarm was initiated. The FTL/STR or designee serves as the area warden for the project and completes the personnel accountability based on the sign-in roster used to control site access. As described next, the method used to report the results of the accountability process varies depending on the nature of the emergency event.

For total area evacuations, the Emergency Control Center is activated and all personnel gather at the evacuation assembly area designated by the EAM. In this situation, the project area warden reports the result of the accountability process to the CFA PAL or INTEC designated area warden coordinator.

The Emergency Control Center is also activated for TAKE COVER alarms; however, personnel remain in the closest appropriate shelter or vehicle. In this situation, a complete personnel accountability report is not required, but the project area warden should report the result of the accountability process to the Emergency Control Center.

The Emergency Control Center may not be activated for a site local area evacuation. In this situation, a complete personnel accountability report is not required, but the project area warden should report the result of the accountability process to the on-scene commander.

12.6.4 Notifications

The FTL/STR should immediately notify the CFA facility manager and/or the INTEC PSS of all significant abnormal events in accordance with MCP-190, "Event Investigation and Occurrence Reporting." The project emergency contact list is provided in Appendix A.

Notification requirements are established in PLN-114, "INEEL Emergency Plan/RCRA Contingency Plan, Section 5," for events that are categorized as emergencies or unusual occurrence. For this reason, the project shall immediately report all abnormal events that occur to the CFA facility manager, INTEC PSS, and the WCC. The WCC will, in turn, notify the appropriate INEEL emergency response resources and other INEEL facilities as appropriate.

The EAM is the single point of contact between the project and the INEEL ERO and off-Site (off-INEEL) agencies. The EAM will make off-Site notifications as described in EPI-9, "Emergency Event Notifications." The Emergency Operations Center, in conjunction with the Joint Information Center, will respond to all media requests. Tables 12-2 and 12-3 list project notification responsibilities.

12.6.5 Evacuation Routes

The primary evacuation routes are shown in Figure 12-2. These routes may be used in response to a total area evacuation as directed by the EAM. Copies of the evacuation routes shall be posted at the site. Secondary evacuation routes will be based upon communications from the WCC and in the project offices.

12.7 Reentry and Recovery

12.7.1 Reentry

During an emergency response it is sometimes necessary to reenter the scene of the event. Reasons for performing reentries may include the following:

- Personnel search and rescues
- Medical first aid responses
- Safe shutdown actions
- Mitigating actions
- Evaluate and prepare damage reports
- Radiation and/or hazardous material surveys.

Reentries shall be carefully planned and coordinated with the appropriate facility personnel, Fire Department, and other responding organizations to ensure that personnel are protected from harm and to prevent initiating another emergency event. Reentry planning is undertaken as a graded approach depending on the nature of the initiating event.

12.7.2 Recovery

After the initial corrective actions have been taken and effective control established, response efforts will shift toward recovery. Recovery is the process of assessing postevent/emergency conditions, developing a

plan for returning to pre-event/emergency conditions, when possible, and following the plan to completion. The EAM is responsible for determining when an emergency situation is sufficiently stable to terminate the emergency and enter the recovery phase. The facility manager will appoint the recovery manager.

Table 12-3. Project notification responsibilities.

Activity	Title	Phone	Pager	Radio
Field Team Leader/Subcontractor Technical Representative				
Notifies	Fire Department	526-1515	—	H INL OSC
Notifies	Warning Communication Center (WCC)	526-1515	—	H INL OSC
Notifies	INTEC plant shift supervisor	526-3100	2096	H INL OSC
Notifies	CFA facility manager	526-2830	5084	—
Notifies	CFA emergency planner	526-2226	4513	—
Notifies	For spills: Environmental Affairs Spill Team	—	6400	—
Notifies	SP-6 manager	526-8226	—	—
Notifies	NE-ID facility representative	526-1661	3422	—
Notifies	Clean/Close INTEC director	526-4561	6602	—
Notifies	Clean/Close INTEC ES&H	526-8079	5728	—

12.8 Critique of Response and Follow-up

A review and critique will be conducted following all emergency events, drills, and exercises at INEEL. In some cases, an investigation may be required prior to commencing recovery actions. For this reason, care should be exercised to preserve evidence when appropriate.

12.9 Telephone/Radio Contact Reference List

The project emergency contact list is provided in Appendix A. Changes to this contact list will not necessitate a change in the document as long as the changes are communicated to the project personnel and the updated contact list is posted at the job site immediately upon change.

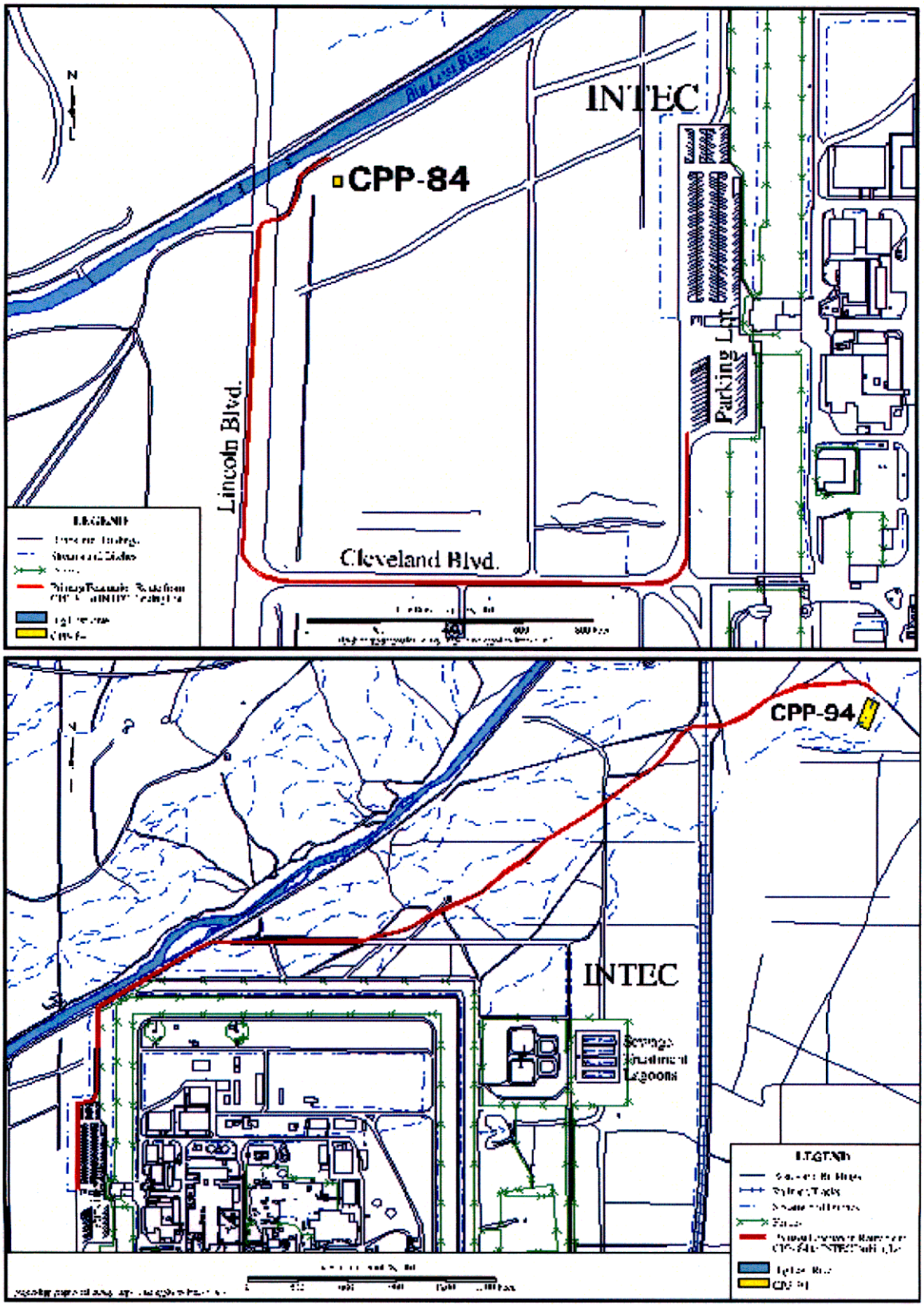

Figure 12-2. Primary evacuation routes for CPP-84 and CPP-94.

13. RECORDKEEPING REQUIREMENTS

13.1 Industrial Hygiene and Radiological Monitoring Records

When industrial hygiene support is required, the industrial hygienist will record airborne monitoring and sampling data (both area and personal) collected for exposure assessments in the ICP Hazards Assessment and Sampling System database. All monitoring and sampling equipment will be maintained and calibrated in accordance with ICP procedures and the manufacturer specifications. Industrial hygiene airborne monitoring and sampling exposure assessment data are treated as limited access information and maintained by the industrial hygienist in accordance with ICP company wide Safety and Health Manual procedures.

Radiological control personnel maintain records of radiological monitoring, daily project operational activities, and instrument performance checks in accordance with company wide Manual 15B, "Radiation Protection Procedures."

Project personnel or their representatives have a right to the monitoring and sampling data (both area and personal) from both the industrial hygienist and the RCT. Results from monitoring data also will be communicated to all field personnel during daily POD meetings and formal prejob briefings, in accordance with MCP-3003.

13.2 Field Team Leader/Subcontractor Technical Representative and Sampling Logbooks

Logbooks will be maintained in accordance with MCP-1194, "Logbook Practices for ER and D&D&D Projects." The FTL/STR will keep a record of daily site events in the FTL/STR logbook and will maintain accurate records of all personnel (e.g., workers and nonworkers) who are onsite each day in a site attendance logbook. Logbooks must be obtained from the field data coordinator for the INEEL Sample and Analysis Management. The completed logbooks must be returned to the INEEL Sample and Analysis Management within 6 weeks of project completion. The logbooks are then submitted to ICP Document Control.

13.3 Document Control

Document Control organizes and maintains data and reports generated by Clean/Close Program field activities. Document Control maintains a supply of all controlled documents and provides a system for the control and release of controlled documents, reports, and records.

Completed sample logbooks are submitted to Sample and Analysis Management within 6 weeks of project completion. All other project records and logbooks, except industrial hygiene logbooks, must be forwarded to Administrative Records and Document Control (ARDC) within 30 days after completion of field activities.

13.4 Site Attendance Record

If required to be maintained separately, the site attendance record will be used to keep a record of all personnel (i.e., field team members and nonfield team members) onsite each day and to assist the area warden with conducting personnel accountability should an evacuation take place (see Section 12 for emergency evacuation conditions). Personnel will only be required to sign in and out of the attendance

record once each day. The FTL/STR is responsible for maintaining the site attendance record and for ensuring that all personnel on the project site sign in (if required).

13.5 Administrative Record and Document Control Office

The ARDC office will organize and maintain data and reports generated by ICP field activities. ARDC maintains a supply of all controlled documents and provides a system for the control and release of controlled documents, reports, and records. Copies of the management plans for the ICP, this HASP, the ICP Project Management Plan (PLN-694), the Quality Assurance Project Plan (DOE-ID 2004), and other documents pertaining to this work are maintained in the project file by the ARDC office.

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Appendix A

List of Project Personnel

Appendix A

List of Project Personnel

Table A-1. Clean/Close INTEC Subproject 6 project emergency contact list.[a]

Contact Title	Contact Name	Phone Number or Radio Net	Cellular Phone Number	Pager Number
Fire, medical emergency, and security Warning Communications Center	—	777 6-1515	—	—
Subcontract technical representative	Bruce Birk	—	—	6194
INTEC plant shift supervisor	Duty Officer	6-3100	—	2096
CFA facility management	Gary Braun	6-2830	—	5084
Clean/Close INTEC environment, safety, and health manager	Corrinne Jones	6-8079	520-4191	5728
Radiological control supervisor	Wiley Spruill	6-0244	521-2697	5008
Department of Energy Idaho Operations Office facility representative	Rachel Collins Hall	6-1661	—	3422
Clean/Close INTEC director	R. Loos	6-4561	520-1189	6602
Clean/Close INTEC Subproject 6 project manager	Doug Kuhns	6-8226	521-5560	—
Group 6 project manager	Lee Davison	6-3770	520-3707	—
Clean/Close INTEC field team leader	Mark Varvel	6-4424	520-6023	—
Clean/Close INTEC health and safety officer	L. McManamon	6-3658	521-8405	—
Clean/Close INTEC industrial hygienist	Cory Stolworthy	6-3430	—	5656
Clean/Close INTEC fire protection engineer	Patrick Smith	6-5168	521-9157	4961
Clean/Close INTEC program environmental compliance	Lee Tuott	6-7990	—	—

a. Shaded areas indicate item not applicable.